

# GHAJAR EXHIBIT 44

10/31/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.  
Highly Confidential - Attorneys' Eyes Only

Chaya Nayak

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN OF CALIFORNIA  
SAN FRANCISCO DIVISION

\_\_\_\_\_  
RICHARD KADREY, e al., )  
Individual and )  
Representative, )  
 )  
Plaintiffs, )

v. )

Case No. 3:23-cv-03417-VC

META PLATFORMS, INC., )  
 )  
Defendant. )

\_\_\_\_\_ )

\*\* HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY \*\*

Videotaped Deposition of CHAYA NAYAK  
San Francisco, California  
Thursday, October 31, 2024

Reported Stenographically by  
Michael P. Hensley, RDR, CSR No. 14114

\_\_\_\_\_  
DIGITAL EVIDENCE GROUP  
1730 M Street, NW, Suite 812  
Washington, D.C. 20036  
(202) 232-0646

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1 Q. And your home address?

2

3 Q. And are you presently employed?

4 A. I am.

5 Q. By whom?

6 A. By Meta Platforms.

7 Q. What's your current title?

8 A. Director of product management.

9 Q. Have you ever been deposed before?

10 A. I have not.

11 Q. Okay. And so I'm sure that Mr. Weinstein  
12 went over all the rules of the deposition. They're  
13 the same as mine, I suspect, but I just wanted to  
14 reiterate that if I ask a question that you find  
15 confusing, you can ask me to clarify it.

16 If you need to take a break, that's  
17 absolutely fine. I'll try to do breaks pretty  
18 regularly, but if there's a question pending,  
19 just -- we ask that you don't try to take a break  
20 during the -- during that time.

21 Is there anything that would limit your  
22 ability to testify truthfully today?

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1           Okay. So we were talking about you joined  
2   the generative AI team, and is your role when you  
3   start director of PMs?

4           A. When I started, I was product manager.

5           Q. So you were a PM?

6           A. Correct.

7           Q. And then you became -- when did you become  
8   the director?

9           A. I became a director of product management  
10   in March of this year.

11          Q. Is there only one director?

12          A. No.

13          Q. Who are the other directors?

14          A. There are probably 300 directors in the  
15   org.

16          Q. Of product management for generative AI?

17          A. Of product management for generative AI, I  
18   would say there's probably at least 15 of us.

19          Q. Okay.

20                Okay. And so you talked about a product  
21   manager for product -- sorry, for platform. And you  
22   said that they focus on how gen A -- GenAI goes into

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1 other products?

2 A. Correct.

3 Q. And so my question for you was, is this

4 product manager looking at how Llama can be

5 incorporated into Facebook's -- or into Meta's

6 commercial products?

7 A. That's one of their roles, yes.

8 Q. Okay. And how do they do that?

9 A. They work with other product managers

10 across the company to plan roadmaps for Llama's use

11 within the products.

12 Q. And is Llama presently incorporated into

13 Meta's commercial products?

14 A. Yes.

15 Q. Which ones?

16 A. It is incorporated into Instagram,

17 Facebook, WhatsApp, Ray-Ban's Meta glasses.

18 Q. Wait, what is that one?

19 A. Ray-Ban's Meta.

20 Q. Oh, the glasses?

21 A. The smart glasses.

22 Q. Okay.

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1 Q. What about Llama 3?

2 A. We moved over to Llama 3 once it was  
3 available.

4 Q. Okay.

5 And what about Llama 4? What stage is  
6 Meta at with Llama 4, presently?

7 A. We are beginning to train it.

8 Q. Okay. And are you responsible for driving  
9 the Llama 4 plan and the data strategy?

10 ATTORNEY WEINSTEIN: Object to form.

11 THE WITNESS: Yes.

12 BY ATTORNEY POUYMIROU:

13 Q. What does it mean to be responsible for  
14 driving Llama 4 plan -- Llama 4 planning, excuse me?

15 A. That means that I organize and manage  
16 across engineering, product management, data  
17 science, and other teams --

18 Q. Mm-hmm.

19 A. -- towards the vision of Llama 4.

20 Q. What is the vision?

21 A. The vision of Llama 4 is to create a model  
22 that is state of the art.

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1 Q. Does this mean to create a model that can  
2 beat GPT-4?

3 A. Ideally, it's to create a model that is  
4 competitive with the rest of the industry.

5 Q. And is GPT-4 considered best in class at  
6 Meta?

7 A. No.

8 Q. What is?

9 A. What is likely to be the next generation  
10 of models like GPT-5.

11 Q. Okay.

12 A. 01.

13 Q. Do you have any sense of when Llama 4 will  
14 be launching?

15 A. Next year.

16 Q. And will Llama 4 also be incorporated into  
17 Meta's commercial products?

18 A. We intend to, yes.

19 Q. Do you work on policy strategies with  
20 respect to the data used for Llama 4?

21 A. Yes.

22 Q. What does that mean to you, that question?

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1           A.    -- on how particular datasets, I think  
2    maybe LibGen was one of them, improved the data  
3    relative to Llama 2.

4           Q.    Okay. And so in your work overseeing  
5    data, how would you define what you're doing in this  
6    point in time with respect to data? Are you  
7    overseeing the data teams?

8           ATTORNEY WEINSTEIN: Object to form.

9           THE WITNESS: No, not really. Can -- can  
10   you rephrase your question.

11   BY ATTORNEY POUYMIROU:

12           Q.    So earlier on you said you -- when you  
13    moved into GenAI, you were working with data. It  
14    was one of the things that you were working with.  
15    And I'm just -- I'm curious what you were doing with  
16    the data teams.

17           A.    My role was to help define the data  
18    strategy, partner with engineering to bring clarity  
19    to that strategy, and ensure that they were  
20    prioritizing the right work relative to that  
21    strategy.

22           Q.    Okay. And the Llama that is being worked



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1 CERTIFICATE OF SHORTHAND REPORTER

2

3 I, Michael P. Hensley, Registered Diplomate

4 Reporter for the State of California, CSR No. 14114,

5 the officer before whom the foregoing deposition was

6 taken, do hereby certify that the foregoing

7 transcript is a true and correct record of the

8 testimony given; that said testimony was taken by me

9 stenographically and thereafter reduced to

10 typewriting under my direction; that reading and

11 signing was not requested; and that I am neither

12 counsel for, related to, nor employed by any of the

13 parties to this case and have no interest, financial

14 or otherwise, in its outcome.

15

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Michael P. Hensley, CSR, RDR

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